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# COMBINED SPILL PREVENTION CONTROL AND COUNTERMEASURE/STORMWATER PREVENTION PLAN

*Prepared For:*  
Waterside Power, LLC.  
17 Amelia Place  
Stamford, Connecticut

*Prepared By:*  
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August 2007  
7610901



### ENGINEER'S CERTIFICATION – 40 CFR 112.3(B)

I hereby certify that someone under my direct supervision has visited and examined the facility and, being familiar with the requirements of 40 CFR Part 112, I attest that: this SPCC Plan has been prepared in accordance with good engineering practices, including consideration of applicable industry standards, and with the requirements of 40 CFR Part 112; that procedures for required inspections and testing have been established; and, that the plan is adequate for this facility.

Engineer: John D Plante P.E.

Signature: \_\_\_\_\_

License No: \_\_\_\_\_

State: Connecticut

Date: \_\_\_\_\_

The above certification must be renewed when making any technical amendments to this SPCC Plan. Questions or comments on the contents of this report should be directed to the individual listed above.

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## EMERGENCY CONTACT AND NOTIFICATION LIST

Waterside Power L.L.C.  
Stamford, CT

### Spill/Stormwater Management Team

#### Emergency Personnel/Spill Response Coordinators

##### Primary:

Name: Ken Roberts, Jr. Title: Vice President

Cell/Business – (860) 460-4246

##### Alternate:

Name: Jason Deering Title: Lead Operator

Cell/Business – (850) 450-8282 / (203) 325-3939

#### Emergency Agencies

National Response Center.....(800) 424-8802  
CT DEP Oil and Chemical Emergency Response (24 Hour Spill Reporting) .....(860) 424-3338  
State Emergency Response Commission (SERC) .....(860) 424-3373  
EPA Region 1 Response Center .....(617) 223-7265  
Stamford Emergency Management Division (Police and Fire Department) .....911

#### Emergency Spill Response Contractors

Clean Harbors.....(860) 645-8265  
Fleet Environmental Services .....(888) 233 - 5338

## IMMEDIATE SPILL RESPONSE ACTIONS

The following procedures will be taken by facility personnel to mitigate or prevent any discharge or substantial threat of product release resulting from operational activities. The procedures are appropriate for any discharge at the facility including equipment failure, tank failure, piping rupture, leak, explosion or fire.

1. **DON'T PANIC – TAKE CONTROL – THINK SAFETY**
2. **EVALUATE NEED FOR**
  - Emergency Medical - .. If any personnel are injured, call 911 for medical assistance.
  - Fire - Eliminate sources of ignition.
  - Police
  - Evacuation -If required, refer to the Facility Evacuation and Assembly Plan (Section 4.4) and perform specified actions. Evacuation routes are shown on the Facility Plot Plan.
3. **STOP THE SOURCE – If you can SAFELY**
  - Take measures to stop the release (e.g., shut valves, stop relevant transfer operations) and secure area.
  - Request all unnecessary personnel to stand clear of area.
4. **GET BUDDY/BACK-UP HELP**
5. **CALL IN HELP**
  - Contact Spill Prevention Team Leader or Alternate as shown on the Emergency Contact and Notification List above on page i.
  - Contact other Spill Prevention Team members, as necessary.
6. **INITIATE RESPONSE ACTIONS/CONTAIN SPILL**
  - **SAFETY IS THE FIRST PRIORITY.** If you are not sure that you can safely respond to the spill, wait for help.
  - If the spill is on fire or other health hazards are present, DO NOT attempt to stop or contain the spill.
  - DO NOT enter confined spaces (i.e., sewers, trenches, buildings/rooms with limited access).
  - When in doubt, consider the event as an emergency requiring HazMat response by trained individuals with Self-Contained Breathing Apparatus (SCBA).
  - Immediately contain leaked material with sorbents, sand or by other means, if such actions can be accomplished safely.
  - Identify the product/material/waste, which is involved in the spill. Get MSDSs from on-site file.
  - Note any special conditions that may hamper or render the clean-up operation more difficult for outside contractors and be prepared to communicate such information immediately.

## IMMEDIATE SPILL RESPONSE ACTIONS (cont'd)

### 7. BEGIN EXTERNAL NOTIFICATIONS

- Emergency response contractors:  
Clean Harbors .....(860) 583 - 8917  
Fleet Environmental Services.....(888) 233 - 5338

- For a release to the environment (air, water, land) of any quantity, notify the CTDEP  
UPDATE WITH WORDING FORM CTDEP ACT

If

- The spill is more than 1,000 gallons of oil; or,
- The discharge violates applicable water quality standards; or
- The discharge causes a sheen on surface water in two spill events within a twelve month period.

Then, Notify the USEPA Regional Administrator immediately to determine if a spill report should be submitted.

- For spills that may affect adjacent residences (e.g., drinking water well contamination, hazardous vapors, etc.), notify the property owners through police and fire officials.
- For spills that may affect any of the public utilities (water, sewer, electric, telephone or gas), notify the proper authorities.

### 8. RECORD ACTIONS

Record the sequence of events (identify actions taken by time of day and elapsed time) as they are performed to respond to the spill and continue to use the Spill Notification Form (Appendix C) until the spill response is terminated.

REGULATORY CROSS-REFERENCE  
Waterside Power, L.L.C.  
Combined SPCC/SWPPP Plan

ENVIRONMENTAL PROTECTION AGENCY Spill Prevention Control and Countermeasure Plan Elements (40 CFR 112.7)		Found In:	
Section	Description of Rule	Section	Page(s)
§ 112.7	General requirements for SPCC Plans for all facilities and all oil types.		
§ 112.7(a)	General requirements; discussion of facility's conformance with rule requirements; deviations from Plan requirements; facility characteristics that must be described in the Plan; spill reporting information in the Plan; emergency procedures.	1.1	2
§ 112.7(b)	Fault analysis (Direction Prediction, Flow Rate, Total Possible Quantity Discharged)	3.1 Table 2	10 - 12
§ 112.7(c)	Secondary containment (Appropriate Containment/Diversory Structures/Equipment to Prevent Discharge from Reaching Navigable Waters)	3.2	12
§ 112.7(d)	Contingency planning (Impracticability Demonstrated)	N/A	N/A
§ 112.7(e)	Inspections, tests, and records	6.2, 6.3, 6.4 Appendix B	35 - 38
§ 112.7(f)	Employee training and discharge prevention procedures	6.1	34
(1)	Training on Operation and Maintenance of Equipment to Prevent Discharges of Oil and Applicable Regulations	6.1.1	34
(2)	Designated Person Accountable for Spill Prevention	--	i
(3)	Periodic Spill Prevention Briefings	6.1.1, Appendix B	34
§ 112.7(g)	Security (excluding oil production facilities)		
(1)	Facility Fully Fenced and Entrance Gates Locked and/or Guarded	2.5	9
(2)	Master Flow and Drain Valves Secured in Closed Position when in a Non-Operating or Standby Status	N/A	N/A
(3)	Starter Controls on Pumps Locked in the Off Position or Located at a Site Accessible Only to Authorized Personnel When in Non-operating or Standby Status	N/A	N/A
(4)	Transfer Connection(s) of Pipelines Capped or Blank-Flanged when Not in Service	N/A	N/A
(5)	Facility Lighting Adequate to Facilitate Discovery of Spills and to Deter Vandalism	2.5	9
§ 112.7(h)	Loading/unloading (excluding offshore facilities)		



(1)	Use a Quick Drainage System for Tank Car or Tank Truck Loading and Unloading Areas	N/A	N/A
	Containment System Must be Designed to Hold at Least maximum Capacity of any Single Compartment of Tank Car or Tank Truck	5.2.4	27
(2)	Provide Interlocked Warning Light or Physical Barrier System	NA	NA
	System to prevent departure Before Complete Disconnect from Transfer Lines:	5.2.4	27
	Interlock Brake System	N/A	N/A
	Physical Barrier System	N/A	N/A
	Warning Lights and/or Signs	N/A	N/A
(3)	Vehicle Inspection Prior to Transfer and Departure	5.2.4	27
§ 112.7(i)	Brittle fracture evaluation requirements	N/A	N/A
§ 112.7(j)	Conformance with State requirements	5.3	30
§ 112.8	Requirements for onshore facilities (excluding production facilities).		
§ 112.8(a)	General and specific requirements	1.1	2
§ 112.8(b)	Facility drainage	5.1	24
(1)	Drainage from Diked Storage Areas via Manually Operated Valves	5.1	24
(2)	Stormwater Inspected Prior to Discharge not Open Water from Diked Storage Areas	N/A	N/A
(3)	Drainage From Undiked Areas Flows Away from Flood Areas	N/A	N/A
(4)	If Plant Drainage Not Engineered, Final Discharge of In-Plant Ditches Equipped with Diversion System to Return Spills to Facility	N/A	N/A
(5)	If Pump Transfer Needed, Two Lift Pumps Provided	N/A	N/A
§ 112.8(c)	Bulk storage containers	2.4.1	5
(1)	Compatibility of Material and Construction of Tanks to Oil Stored and Conditions of Storage	2.4.1	5
(2)	Adequate Secondary Containment	2.4.1	5
(3)	Drainage of Rainwater from Diked Areas	5.1	24
(i)	Bypass Valve Sealed Closed	N/A	N/A
(ii)	Run-off Rainwater Inspected for Water Quality Standards Compliance	5.3	
(iii)	Bypass Valve Opened and Resealed Properly Following Drainage	N/A	N/A
(iv)	Adequate Record Keeping of Drainage Events	Appendix B	
(4)	Underground Tanks	N/A	N/A
(5)	Partially Buried Tanks	N/A	N/A
(6)	Aboveground Tanks	2.4.1	5
	Visual Inspections	6.2.2, Appendix B	36, Appendix B
	Additional Testing Techniques and Record Keeping	N/A	N/A

(7)	Internal Heating Coils Utilized	N/A	N/A
	Steam Return/Exhaust Monitored for Contamination	N/A	N/A
	External Heating System Utilized	N/A	N/A
(8)	Tanks Fail-safe Engineered	N/A	N/A
(i)	Audible High Liquid Level Alarm	2.4.1	5
	Visual High Liquid Level Alarm	2.4.1	5
(ii)	Automatic High Liquid Level Pump Cutoff	N/A	N/A
(iii)	Communications between Gauger and Pumping Station	N/A	N/A
(iv)	Fast Response System of Determining Liquid Level in Tanks	N/A	N/A
(v)	Sensing Devices/Gauges Tested Regularly	N/A	N/A
(9)	Effluent Discharges to Navigable Waters Observed Frequently to Detect Oil Spills	N/A	N/A
(10)	Visible Oil Leaks Promptly Corrected	5.2.4	27
(11)	Mobile or Portable Oil Storage Tanks	N/A	N/A
§ 112.8(d)	Facility transfer operations, pumping, and facility process		
(1)	Buried Pipelines Corrosion Protected	N/A	N/A
(2)	Not-in-service Pipelines Capped with Origin Marked	N/A	N/A
(3)	Pipe Supports Designed to Minimize Abrasion and Corrosion and Allow for Expansion and Contraction	N/A	N/A
(4)	Aboveground Valves and Pipelines Inspected Regularly	6.2.2	36
	Spill Containment System Provided	N/A	N/A
	Periodic Pressure Testing of Valves and Pipelines Conducted	6.3.2	37
(5)	Vehicle Traffic Warned of Aboveground and Underground Pipelines	N/A	N/A
§ 112.9§ 112.13	Requirements for onshore production facilities	Not Applicable	
§ 112.10§ 112.14	Requirements for onshore oil drilling and workover facilities	Not Applicable	
§ 112.11, § 112.15	Requirements for offshore oil drilling, production, or workover facilities.	Not Applicable	
§ 112.12	Requirements for Animal Fats and Oils and Greases, and Fish and Marine Mammal Oils, and for Vegetable Oils, including Oils from Seeds, Nuts, Fruits, and Kernels.	Not Applicable	

REGULATORY CROSS-REFERENCE (continued)  
Waterside Power, L.L.C.  
Combined SPCC/SWPPP Plan

DEPARTMENT OF ENVIRONMENTAL PROTECTION Stormwater Pollution Prevention Plan Elements (Section 5 (b) 6)		Found In:	
Section	Title	Section	Page
(A)	Stormwater Pollution Prevention Plan Team		
(B)	Description of Potential Pollutant Sources	2.4	4
(i)	Drainage	5.1	24
(ii)	Inventory of Exposed Material	2.2, 2.3, 2.4	3 -9
(iii)	Spills and Leaks	3.3	15
(iv)	Monitoring Program	5.3	30
(C)	Measures and Controls	5.2, table 4	26 -29
(i)	Good Housekeeping	5.2.1	26
(ii)	Vehicle or Equipment Washing	N/A	N/A
(ii)	Roof Areas	N/A	N/A
(iv)	Sediment and Erosion Control	5.2.2	26
(v)	Preventative Maintenance	5.2.3	27
(vi)	Spill Prevention and Response Procedures	5.2.4	27
(vii)	Employee Training	6.1.2	35
(viii)	Non-Stormwater Discharges	5.2.5	27
(ix)	Management of Runoff	5.2.6	28
(x)	Inspections	6.2.1, Appendix B	36, Appendix B

## 1.0 INTRODUCTION

Langan Engineering and Environmental Services (LEES) has prepared this combined Spill Prevention, Control and Countermeasure (SPCC)/Stormwater Pollution Prevention (SWPP) Plan (herein referred to as the "Plan") on behalf of Waterside Power, L.L.C. located in Stamford, Connecticut. The Plan covers the Waterside Power Plant facility located at 17 Amelia Street, Stamford, Connecticut (see Figure 1). The existing facility plan dated January 2005 has been revised due to the addition of facility structures and to address the 26 December 2006 revisions to 40 CFR Part 112.

The Plan has been prepared in accordance with the U.S. Environmental Protection Agency (EPA) regulation regarding oil pollution prevention (40 CFR Part 112) which requires a Spill Prevention, Control and Countermeasures Plan (SPCC) and the Connecticut Department of Environmental Protection (DEP) General Permit for the Discharge of Stormwater Associated with Industrial Activity, issued October 1, 1997, which requires a Stormwater Pollution Prevention Plan (SWPP). This combined Plan is intended to meet the planning requirements of both regulations.

According to 40 CFR Part 112, all installations and activities with stationary on-shore facilities not regulated by the Department of Transportation are required to prepare, maintain and implement an SPCC Plan if both of the following qualifications are applicable:

1. Due to its location, the installation or activity has the potential to spill oil or a hazardous substance in such quantity that it would be harmful to human health or welfare, or to the environment.
2. The installation or activity meets at least one of the following criteria:
  - Aggregate aboveground oil storage on the site is greater than 1,320 gallons; and
  - Total underground oil storage on the site is greater than 42,000 gallons.

Waterside Power is required to meet SPCC requirements since greater than 1,320 gallons of oil is stored aboveground at the facility and several aboveground storage tanks at the facility have a capacity greater than 660 gallons. This Plan describes the procedures,

methods and equipment used to prevent the discharge of oil and hazardous substances into the environment. Additionally, Waterside Power is required to register under the provisions of the Stormwater General Permit since the facility conducts "industrial activities" which are exposed to stormwater and the Standard Industrial Code (SIC) of the facility is 4911.

## 1.1 General Requirements

This plan has been prepared in accordance with good engineering practices and has the full approval of the site's management. Site management has a level of authority to commit the necessary resources to fully implement the plan and will commit the necessary manpower, equipment, and material required to expeditiously control and remove any quantity of oil discharged that may be harmful. This plan does not deviate from the Plan requirements outlined in 40 CFR 112.

## 2.0 FACILITY DESCRIPTION

This section describes the site layout, physical characteristics, structures and operational appurtenances located at the Waterside Power, L.L.C. site in Stamford, Connecticut.

### 2.1 Site Description

The site is located in the Waterside section of southwest Stamford, less than ½ mile from the corporate boundary between the City of Stamford and Town of Greenwich. The site location is shown in Figure 1. Industrial areas surround the site, except for a residential community to the north. The site is bounded to the north by the street Amelia Place and a residential neighborhood, to the west by the Stamford Executive Park, to the south/southeast and east by Metro North/AMTRAK rail lines, and to the northeast by the Northeast Utilities Waterside electric substation.

The site is approximately 5.8 acres, is relatively flat with a dirt and processed aggregate surface, and is lacking in any significant vegetation. The site is tiered in three levels, the first two of which are at approximately 55 feet and 62 feet above mean sea level, and are referred to as the lower and middle decks, respectively. The third level (the upper deck), closest to Amelia Place, is a relatively flat, landscaped, area. This level also contains a four-foot high earthen berm, which runs parallel to Amelia Place.

## 2.2 Facility Structures

The lower deck houses three turbine generator units, five Connex Boxes (of which only three are used for the storage of oil containing materials in 55-gallon drums), six axel assemblies, an underground oil/water separator, and a black start generator. During the winter months, the facility also maintains three temporary boilers on the lower deck. Five fuel oil tanks with a tanker transfer pad/sump, two transformers, each within a bermed area equipped with a sump, an office trailer with a parking area, and a de-ionized water system are located on the middle deck. Both the middle deck and lower deck are slightly graded toward the south. One catch basin is located on the southern end of the middle deck, and multiple catch basins are located around the lower and upper decks. All catch basins discharge through an oil/water separator at the southern end of the site. The oil/water separator discharges into a wetland area located south of the site.

## 2.3 Facility Operations

Waterside Power, LLC. has installed three GE TM2500 turbine generator units at the site. The installation was in response to a request by ISO New England to provide emergency generating capacity in southwest Connecticut to improve system reliability at times of peak loads during the period between June 1<sup>st</sup> through September 30<sup>th</sup>. Each power-generating unit is rated at 23.2 megawatts (MW) at 90-degrees Fahrenheit. Operation is limited in accordance with ISO New England's Southwest Connecticut Emergency Capability Supplement to a maximum of eight hours per day and 200 hours total during the four-month operating period.

The facility's operation has been expanded into an emergency facility that operates during peak demand times or during power disruptions year-round. During the winter months; mid-October to mid-April, the facility operates three winter boilers. Each of these boilers are mobile and each unit contains 300 gallons of fuel oil which is self contained. The boilers are removed from the site during the summer months.

The turbine power generating units and ancillary equipment are trailer mounted, designed to be driven onto the site, interconnected with the existing substation, and then removed when necessary, leaving the site in the pre-installation condition. However, the facility is now operating year round and the turbine units are not likely to be removed from the site. Each unit consists of four trailers: the turbine

generator trailer; inlet filter trailer; exhaust trailer; and auxiliary trailer. All equipment is enclosed within a trailer exterior. Each four-trailer unit requires an area approximately 103 feet by 70 feet. Fuel oil and demineralized water storage tanks and office/maintenance trailers are required to support operations, and are removed once the operating period ends. The turbine generator units are fueled by ultra-low sulfur fuel oil. Fuel oil is stored on site in five 20,000-gallon fuel oil storage tanks. Fuel oil is delivered to the site via tanker trucks and conveyed to the power generating units through above-ground black iron, welded seam piping.

## 2.4 Oil Storage Tanks, Containers, and Conveyances

Oil Storage on site includes:

- Five 20,000-gallon aboveground storage tanks (ASTs) containing No. 2 fuel oil needed to fuel the three turbine power generating units;
- Two electrical transformers that contain insulating oil;
- One black-start generator;
- The three turbine generator units, located on the lower deck, which contain lube and hydraulic oil;
- During winter months, (mid-October through mid-April) three temporary boiler units, which each have a 300-gallon fuel oil storage tank;
- 800 linear feet of single-walled welded seam black iron fuel oil piping;
- 55 Gallon Drums of Generator Lube Oil stored in a Connex storage Compartment or Covered Plastic Drum Storage Bin (11 drums observed during Langan's site reconnaissance);
- 55 Gallon Drums of Jet Oil stored in a Connex storage Compartment or Covered Plastic Drum Storage Bin (5 drums observed during Langan's site reconnaissance);
- 55 Gallon Drums of Hydraulic oils stored in a Connex storage Compartment or Covered Plastic Drum Storage Bin (6 drums observed during Langan's site reconnaissance); and
- Several 55-gallon containers of spent oil.

A listing of the oil containing structures is outlined in Table 1. The locations of equipment and storage tanks containing oils are indicated on the Site Plan (Figure 2). Structural or physical design features, which minimize the potential for a release of oil, are described in the sections below. All oil storage equipment is compatible

with their contents, secondary containment and/or a strong oil contingency plan is provided, and inspections are performed [§112.8(c)].

#### 2.4.1 Aboveground Storage Tanks

Five 20,000-gallon double-walled ASTs containing #2 fuel oil are located on the middle deck of the site and are surrounded by a 2.5-foot high containment berm on the south, east and west sides. According to the manufacturer's specifications, each tank is an Underwriters Laboratories listed and labeled (UL 142), horizontal double-walled steel tank. All joints are welded, and updraft and emergency venting are provided per UL 142 requirements. Each tank is equipped with an overfill prevention valve and a high level audible alarm. Leak detection testing was performed on the tanks prior to use. A two-inch monitoring pipe is installed for manual interstitial leak detection. Fuel delivery occurs on an as needed basis. Fuel off-loading procedures are discussed in Section 3.2.1, and a Standard Operating Procedure for this operation is attached in Appendix A.

A secondary containment structure for the fuel off-loading area is located on the north side of the five tanks. The containment is approximately 3 feet deep and is sized to fit a 7,200-gallon tanker truck. One end of the tanker containment pad is ramped allowing the truck to drive into the containment, with stone riprap on the remaining three sides. The containment is layered with clean, screened sand, a double layer of reinforced 12 mm polyethylene sheeting, filter fabric, a second layer of sand, and is then covered with rolled fill.

A manual sump is located within the lined containment allowing for removal of any accumulated storm water. The sump is to remain closed at all times. After a rainstorm, the storm water is visually checked for oil contamination prior to being removed. All storm water captured and removed from this containment will be monitored and recorded on a form included in Appendix B. Completed forms will be maintained with this Plan. The storm water is pumped into a catch basin that subsequently flows through the oil/water separator. All oily waste captured in the oil/water separator will be sent off-site for reprocessing in accordance with applicable regulations.



#### 2.4.2 Transformers

A generator step-up transformer (GSU) containing approximately 10,400 gallons of insulating oil is located on the eastern side of the middle deck. A GSU containing approximately 7,588 gallons of insulating oil is located on the northeastern side of the middle deck. In addition, a pad-mounted station service transformer containing 330 gallons of insulating oil is located on the middle deck between the office building and the five ASTs. The station service transformer is below the threshold for secondary containment. The oil in each transformer is contained within the steel transformer casing. All three transformers are protected from collision by location, as they are situated away from vehicle traffic.

The two larger GSU transformers are contained within earthen berms with a 60-mil polyethylene liner weighted by crushed stone. The bermed containment areas surrounding the transformers are sized to contain 110% of the oil volume contained in the transformers, and collect storm water after a rain event. The containment berms include manually operated sumps, which remain closed at all times. After a rainstorm, the storm water in each sump is visually checked for oil sheens prior to being released. All storm water removed from these berms will be monitored and recorded on a form included in Appendix B. Completed forms will be maintained with this Plan. Storm water collected within the containment areas are pumped into nearby catch basins that subsequently flows through the oil/water separator.

#### 2.4.3 Turbines

Three turbine power-generating units are located on the lower deck, and contain approximately 340 gallons of lube/hydraulic oil each. The oil is self-contained within built-in secondary containment in the turbine casings. Visual and automated leak detection is provided by the level and pressure indicating control system. The deck surrounding the turbines and associated equipment is bermed and all collected rainwater is funneled to a 70-gallon collection sump. All storm water removed from this berm will be monitored and recorded on a form included in Appendix B. Completed forms will be maintained with this Plan. The storm water will be pumped into a catch basin that subsequently flows through the oil/water separator.

The area surrounding the power generating turbines is slightly graded toward a catch basin, which drains to the oil/water separator.

#### 2.4.4 Temporary Portable Equipment

In addition to the permanent facility equipment, three temporary portable boilers are utilized during the winter months (mid-October through mid-April). Each of the portable boilers contains 300 gallons of fuel oil stored in one steel above ground storage tank attached to each unit. The tanks for the boilers fall below the threshold for secondary containment.

#### 2.4.5 Pipelines and Valves

Aboveground pipelines are neither double-walled, nor located in a secondary containment structure. Aboveground oil piping is located in areas that are inaccessible to vehicular traffic. All pipe supports are designed to minimize abrasion and corrosion and allow for expansion and contraction. The piping has been leak tested on site. Aboveground oil piping and associated appurtenances (i.e. valves, flanges) are subject to daily inspections for leaks and deterioration in accordance with Section 6.2.2 of this Plan.

#### 2.4.6 Product and Spent Oil Storage

Hydraulic oils and spent oils are stored on site in a Connex Box located on the southwestern side of the site. The unit is self contained and sorbent socks will be placed around the internal perimeter of the Connex Box to ensure any release of material will be contained.

<p style="text-align: center;">TABLE 1 Waterside Power L.L.C. Stamford, CT</p> <p style="text-align: center;">Oil Containing Equipment and Storage</p>				
Source	Volume (gal)	Location	Type of Containment	Containment (gal)
No. 2 Fuel Oil AST (T1)	20,000	Middle Deck	Double-wall	>20,000
No. 2 Fuel Oil AST (T2)	20,000	Middle Deck	Double-wall	>20,000
No. 2 Fuel Oil AST (T3)	20,000	Middle Deck	Double-wall	>20,000
No. 2 Fuel Oil AST (T4)	20,000	Middle Deck	Double-wall	>20,000
No. 2 Fuel Oil AST (T5)	20,000	Middle Deck	Double-wall	>20,000
Insulating Oil (Active GSU)	10,400	Middle Deck	Earthen & poly berm	11,440
Insulating Oil (Spare GSU)	7,588	Middle Deck	Earthen & poly berm	11,440
Insulating Oil (pad)	330	Middle Deck	None	None
TABLE 1 (cont.)				

Waterside Power L.L.C. Stamford, CT				
Oil Containing Equipment and Storage				
Source	Volume (gal)	Location	Type of Containment	Containment (gal)
Fuel Oil Tanker Truck Delivery	7,200	Middle Deck	Poly berm	11,250
Aboveground Pipelines	~800 Linear feet	Middle & Lower Decks	Singled walled welded seam black pipe	None
Fuel Oil Temporary Portable Boiler (1)	300	Lower Deck	None	None
Fuel Oil Temporary Portable Boiler (2)	300	Lower Deck	None	None
Fuel Oil Temporary Portable Boiler (3)	300	Lower Deck	None	None
Turbine (1)	340	Lower Deck	Built-in in turbine casing	>340
Turbine (2)	340	Lower Deck	Built-in turbine casing	>340
Turbine (3)	340	Lower Deck	Built-in in turbine casing	>340
Black Start Generator	1,000	Lower Deck	Built-in self contained	>1000
Hydraulic Oil	330	Lower Deck	Connex Box	>1000
Spent Oil	330	Lower Deck	Connex Box	>1000

## 2.5 Security

The following security measures are maintained at the facility {§112.7(g)}. A chain link fence surrounds the generating facility yard area. All systems are located within the fenced enclosure. One gate provides access into the facility yard, thereby restricting access to this area. The gate is to be locked during normal operations with access provided by facility personnel. Normal plant lighting and emergency temporary lighting is provided throughout the facility. Operators will be on site throughout the facility's hours of operation, which typically run from 7:00 AM to 6:00 PM, Monday through Friday, although the turbines will run a maximum of 8 hours per weekday. The facility will be manned 24-hours per day, 7-days per week, throughout the duration that the facility is in operation.

### 3.0 SPILL MANAGEMENT

This section of the Plan describes Waterside Power's procedures for spill management at the site, including a discussion of spill prediction, potential spill scenarios, and facility spill history.

#### 3.1 Spill Protection

In accordance with 40 CFR 112.7, there is a reasonable possibility that a spill event could occur at the facility. This section presents potential spill sources and potential causes of spills at Waterside Power.

A spill at the facility could potentially be caused by container overfill, container leaks, container rupture, improper loading/off-loading procedures, pipe rupture, equipment failure or improper maintenance. The quantity of product released would vary depending upon the type of accident causing the release. Table 2 presents a summary of potential spill sources at the facility, spill scenarios and general flow directions. Spills resulting from one of these scenarios would travel as described below.

The most likely spill scenario with the potential for a discharge is associated with transfer of fuel oil from tanker trucks to the ASTs during off-loading operations. The tanker off-loading point in front of the five ASTs is equipped with a secondary containment structure. This containment was described in Section 2.4.1 and allows for the containment of >110% of the volume of a 7,200 gallon tanker truck. Spill pads will also be placed below the transfer hose and connections. The tanker operator and a Waterside Power employee will continuously monitor activities throughout the off-loading operation. In the event of a transfer hose rupture, the potential spill will be limited by immediately closing valves on the hose and shutting down the transfer pump. Assuming a worst-case spill duration of 10 seconds at the maximum pumping rate before closure of the valve, with complete drainage of all petroleum in the transfer hose and piping, the maximum potential spill volume is estimated at approximately 100 gallons. Because of the site's relatively flat topography, the potential spill would flow laterally away from the tank, and slightly toward the south, unless the flow is restricted. Section 3.2.1 presents spill contingency preventative measures during off-loading. This procedure will insure that a potential spill will not flow into ditches or storm water catch basins and will be

contained on-site for immediate recovery and removal. An off-loading SOP is located in Appendix A. Table 2 summarizes the prediction of the direction, rate of flow, and total quantity of oil that could be discharged from all on-site oil sources as a result of a major containment failure [§112.7(b)].

<p align="center"><b>TABLE 2</b> <b>Waterside Power L.L.C.</b> <b>Stamford, CT</b></p> <p align="center"><b>Potential Spill Predictions, Volumes, Rates, and Control</b></p>						
Source	Volume (gal)	Max Rate (gal/hr)	Direction of Flow	Type of Containment	Containment (gal)	Controls
<b>Aboveground Storage Tanks</b>						
No. 2 Fuel Oil AST (T1)	20,000	20,000	South	Double-wall	>20,000	Inspections
No. 2 Fuel Oil AST (T2)	20,000	20,000	South	Double-wall	>20,000	Inspections
No. 2 Fuel Oil AST (T3)	20,000	20,000	South	Double-wall	>20,000	Inspections
No. 2 Fuel Oil AST (T4)	20,000	20,000	South	Double-wall	>20,000	Inspections
No. 2 Fuel Oil AST (T5)	20,000	20,000	South	Double-wall	>20,000	Inspections
<b>Transformers</b>						
Insulating Oil (GSU)	10,400	10,400	South	Earthen & poly berm	11,440	Inspections
Insulating Oil (GSU)	7,588	7,588	South	Earthen & poly berm	11,440	Inspections
Insulating Oil (pad)	330	330	South	None	None	Concrete pad, Inspections
<b>Loading/Off-loading Operations</b>						
Fuel Oil Tanker Truck Delivery	7,200	7,200	South	Poly berm	11,250	Drain covers, monitoring
<b>Other Equipment/Storage</b>						
Aboveground Pipelines	~800 linear feet	~800 linear feet	South	Single-walled welded seam black pipe	None	Inspections
Turbine (1)	340	340	South	Built-in in turbine casing	>340	Inspections
Turbine (2)	340	340	South	Built-in in turbine casing	>340	Inspections
<p align="center"><b>TABLE 2 (cont.)</b> <b>Potential Spill Predictions, Volumes, Rates, and Control</b></p>						
Source	Volume (gal)	Max Rate (gal/hr)	Direction of Flow	Type of Containment	Containment (gal)	Controls

Turbine (3)	340	340	South	Built-in in turbine casing	>340	Inspections
Temporary Portable Boiler (1)	300	300	South	None	None	Concrete pad, Inspections
Temporary Portable Boiler (2)	300	300	South	None	None	Concrete pad, Inspections
Temporary Portable Boiler (3)	300	300	South	None	None	Concrete pad, Inspections
Black Start Generator	1,000	1,000	South	Built-in self contained	>1,000	Inspections
<b>Hydraulic and Used Oil Storage</b>						
Hydraulic Oil	330	330	South	Connex Box	>1000	Inspections, Sorbent socks
Spent Oil	330	330	South	Connex Box	>1000	Inspections, Sorbent Socks

### 3.2 Spill Containment and Prevention

#### 3.2.1 Spill Controls

Spill controls associated with oil storage tanks and systems include double-walled secondary containment and berms. During bulk tanker off-loading operations of fuel oil, specific spill prevention and tanker off-loading procedures will be followed (see Appendix A).

Six emergency spill control equipment kits ("Spill Kit") are provided at the aboveground oil storage tanks, in each of the three power generating turbines at the off loading area, and at locations throughout the facility. Additional spill equipment may include absorbent materials (e.g. Speedi-dry), petroleum absorbent pads and booms, protective clothing and gloves, and safety glasses/goggles. Emergency spill control equipment for the catch basins also include portable rubber diking and catch basin spill mats to block off and cover the catch basins in the event of a spill which might flow into the basins. The Spill Kit will be inspected weekly to insure the inventory of spill equipment materials are stocked appropriately.

Other emergency spill control equipment includes:

<u>Emergency equipment</u>	<u>Amount of each item</u>
Empty 55 gallon drums and lids	13
Shovels (round and flat)	5
Rakes	2
Rolls of duct tape	1
Rolls of 12-mil reinforced poly	2

Tanker truck off-loading procedures are an integral component of this SPCC Plan [§112.7(h)] and spill control. Tank truck off-loading procedures will be conducted under the supervision of facility personnel to ensure that proper off-loading procedures are followed and to ensure that a Waterside Power representative is present in the event of a release.

Upon arrival at the facility the tank truck driver must check in with facility personnel, and the truck will be inspected for signs of leaks or unusual conditions prior to entering the site. Fuel off-loading shall occur in designated areas, at which signs will be posted informing delivery contractors of safety and spill prevention procedures.

A Standard Operating Procedure for tank truck off-loading is provided in Appendix A. The secondary containment for the tank truck off-loading area for the ASTs is described in Section 2.4.1. One 95-gallon over pack spill kit is located at the off-loading area. An oil absorbent blanket on hay bales will be placed under the hose and hose connections to the truck and tank for collection of any possible drips. Prior to and during the transfer of fuel oil to storage tanks, inspections of the tank truck and the receiving AST will be conducted to ensure that spillage and overfilling do not occur. The SOP includes protocols for hose inspection, securing manifolds and valves, and the use of chock blocks to prevent premature disconnect of a tank truck. During the off-loading procedure, tank trucks will be attended to at all times.

Employees specifically charged with fuel oil handling and transferring are thoroughly trained in the proper techniques used to reduce the probability or impact of a spill. Special care is given to this operation since the likelihood of an oil spill is most probable during fuel off-loading. Training is discussed further in Section 6.

### 3.2.2 Spill Prevention



Spill prevention will be achieved through the use of proper off-loading procedures (Appendix A), as previously outlined, through the use of spill control devices, and through the practice of regular maintenance and inspections of the tanks and/or storage systems. Through implementation of these measures and systems, the Waterside Power Project shall minimize the potential for a spill or release associated with aboveground storage tanks and oil storage systems.

### 3.2.3 Substantial Harm Documentation

The Oil Pollution Prevention regulations require a facility to determine whether the facility, because of its location, could reasonably be expected to cause "substantial harm" to the environment by discharging oil into or on the navigable waters or adjoining shorelines [§112.20]. Facilities determined to fall within the "substantial harm criteria" are required to complete a site-specific Facility Response Plan. The determination of whether a facility could cause substantial harm to the environment is made through the completion of a Certification of the Applicability of the Substantial Harm Determination Form. This form has been completed for the Waterside Power Project facility and is included as Appendix E of this Plan.

Based on the Determination Form, the Waterside Power Project could not cause substantial harm to the environment by discharging oil; therefore, a site-specific Facility Response Plan is not required. However, the completed Determination Form must be maintained within this Plan.

## 3.3 Spill History

For a facility that has experienced one or more spill events reportable under Section 311(b)(5) of the Federal Water Pollution Control Act (FWPCA), a written description of each such spill, corrective action taken and recurrence prevention plans must be presented in the Plan. A spill event is defined as a discharge of oil into or upon the navigable waters of the United States or adjoining shorelines in harmful quantities.

Prior to the establishment of the Waterside Power facility, the site was vacant. An industrial building was demolished in September 2001, which had been vacant for about 10 years. No known oil spill events have occurred at this project site within

the past five years in a quantity of five gallons or more. If such a spill occurs, this Plan will be updated to include a written description of the spill (Table 3), corrective action taken, and plans for preventing a recurrence. The Spill/Stormwater Management Team will also notify the appropriate federal and state agencies and complete a Spill Notification Form included in Appendix C.

<p style="text-align: center;">TABLE 3 Waterside Power L.L.C. Stamford, CT</p> <p style="text-align: center;"><i>Summary of Historical Facility Spills</i></p>							
Time/ Date	Product/ Quantity	Nature Source	Location	Spill Flow Direction	Detection Method	Injury to Personnel	Comments (1)
May 18, 2005	2 gallons of generator oil	Loose fitting on intermitte nt line	Interior of Turbine Trailer	Flowed to trailer surface and ground and contained	Visual inspection of pipes	Not Applicable	Spill was immediately ceased and contained with absorbent materials. Oil did not groundwater.

Notes:  
Comment section will include quantity of product to navigable water, method of recovery, contractor (if applicable), clean-up actions, notifications (if applicable), enforcement (if applicable), steps to reduce reoccurrence and effectiveness of monitoring equipment (if applicable).

#### 4.0 SPILL RESPONSE

Details of spill response and notification procedures to be employed by Waterside Power L.L.C. in the event of an incident at the facility are presented in this section of the Plan. This section, combined with several other distinct sections of the Plan, serves as a guideline for effective Plan implementation, including response actions. Identification of response resources for a spill is presented in Section 4.1. Response training is presented in Section 6.1.

##### 4.1 Spill Response Procedures and Resources

The following procedures will be taken by facility personnel to mitigate or prevent any discharge or substantial threat of discharge of product resulting from operational activities. The Spill/Stormwater Management Team members at this

facility will be trained in the procedures described in the Immediate Spill Response Actions found on page ii of this Plan. The procedures are appropriate for any discharge at the facility including equipment failure, tank failure, piping rupture, leak, explosion or fire.

The Waterside Power L.L.C. Spill/Stormwater Management Team members will be trained to respond to minor spills and leaks. In the event of an incidental spill, Waterside Power L.L.C. personnel will utilize available spill response equipment located at the site to begin spill response activities as listed on page ii. Incidental spills and leaks will be responded to and cleaned up immediately and the source(s) of such releases will be promptly repaired.

Should a Waterside Power Project employee observe a release from an AST, petroleum storage system, or associated tank truck off-loading activities, the employee will immediately notify the Primary Spill Team contact on the Spill Prevention Team Listing. If the individual identifying the release has been trained on the requirements of the Plan, has been trained on the use of the spill containment equipment, and the spill can be controlled at the time of the release by the individual without endangering themselves or any other person in any way, then the individual shall take action to control the release. Defensive actions to stop the spill and to clean up the release will only be performed by the contracted Emergency Response Team listed in the Spill Prevention Team Listing. Upon being notified of the release, the Primary Spill Prevention Team Contact will obtain the following information (see Table 3).

- Nature of the spill or leak;
- Location of the spill or leak;
- Size and extent of the spill or leak, the approximate amount spilled, and the direction the liquid is moving;
- Materials involved; and
- Injury to personnel.

As necessary, the Primary Spill Prevention Team Contact will notify the appropriate authorities as outlined in Section 4.2 of this Plan.

#### 4.1.1 Small Spills (20 Gallons or Less)

For a spill or leak which is small enough to be absorbed (20 gallons or less), and which does not pose an adverse exposure hazard to employees, then the spill will be handled in the following manner:

1. Make sure all unnecessary persons are removed from the hazard area. Workers involved in the clean up shall put on protective clothing and equipment.
2. Use absorbent pads, booms, Speedi-dry, earth, sandbags, sand, or other inert materials to contain, divert, and clean up the spill.
3. If spilled material is headed towards a storm drain, place portable rubber diking or spill mats on and around catch basins to prevent the flow from entering into the basins.
4. Contact the Primary Spill Prevention Team Contact.
5. Place all containment and clean-up materials in drums and label for proper disposal.
6. Place all recovered liquid and soil in waste drums and label for removal to an approved disposal facility.

Following cleanup, all emergency equipment and spill containment equipment shall be returned to ready status (restocked). The Primary Spill Prevention Team Contact shall assess the release, and if applicable determine if the secondary containment system is adequate. The Primary Spill Prevention Team Contact shall coordinate Plan amendments, as needed.

#### 4.1.2 Large Spills (Greater than 20 Gallons)

For spills or leaks that cannot be controlled by Waterside Power personnel (all releases > 20 gallons), the Primary Spill Prevention Team Contact shall initiate the following procedures:

1. Call the ambulance service for any injured personnel.
2. Call the fire department if a fire is involved that cannot be extinguished by a facility personnel.
3. Contact an Emergency Spill Response Center listed on the Spill Prevention Team Listing at the beginning of this Plan, and dispatch emergency personnel to the site to take appropriate action.
4. Control flow of released material through use of sorbents, socks, and mounted soil.
5. Contact the proper authorities to report a spill or release as indicated in Section 4.2 of this Plan.

#### 4.2 Spill Notification Procedures

Waterside Power is responsible for all reporting and documentation procedure required under the Oil Pollution Prevention Regulations (40 CFR 112) and pursuant to the guidance in the Determination of Reportable Quantities for Hazardous Substances regulations, 40 CFR 117, or Designation, Reportable Quantities and Notification, 40 CFR 302. Reports are to occur during a 24- hour period. The Primary Spill Prevention Team Contact or their designee is responsible for reporting to the regulatory agencies.

Following a spill, the Primary Spill Prevention Team Contact or designee will note the time, date, approximate quantity of the spill, and any suggestions for reducing the risk of recurrence of a spill (Table 3). This record will be maintained on the site with this Plan.

##### 4.2.1 State Requirements

Per Chapter 446K, Section 22a-450 of the Regulations of Connecticut State Agencies (RCSA), the State of Connecticut requires immediate verbal reporting to CTDEP of any quantity of spill of chemical products and hazardous wastes to land, water of the state, or gas leaks to the air,

followed by a written report within 24 hours of the spill. The person or business that caused the spill and the owner of the property where the release occurred is responsible for cleanup, regardless of fault (Connecticut General Statute 22a-451). The CTDEP had not established minimum quantities for hazardous materials for which no spill reporting is required. Therefore, all spills shall be reported to the CT DEP and a Report of Petroleum or Chemical Product Discharge, Spillage or Release Form (located in Appendix C) shall be completed and submitted to the CT DEP.

Specifically, should a release, discharge, spillage, uncontrolled loss, seepage, or filtration of any quantity of oil/petroleum or chemical products or hazardous wastes occur from a ship, boat, barge, or other vessel, from a terminal (docking area) used for loading or off-loading, or from any vehicle, trailer, or other machine, immediate verbal notification must be made to:

Connecticut Department of Environmental Protection  
Oil and Chemical Spill Response Division  
(860) 424-3338, the 24 hour number, or (860) 424-3333

A copy of CTDEP's "Report of Petroleum or Chemical Product Discharge, Spillage or Release" contained in Appendix C should be filled out and submitted to the address below within 24 hours of knowledge of the release:

Connecticut Department of Environmental Protection  
Bureau of Waste Management  
Oil & Chemical Spill Response Division  
Department of Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

#### 4.2.2 Federal Requirements

All releases of oil to waters of the United States that cause film, sheen, or disposition, or violate applicable water quality standards are immediately reportable to the National Response Center (NRC) at:

National Response Center (NRC)  
(800) 424-8802 (24 Hours/day)

When contacting the NRC, the following information should be provided:

- Time, location and source of the spill;
- Type of quantity of material spilled;
- Cause and circumstances of the spill;
- Hazards associated with the spill;
- Personal injuries;
- Corrective action taken or planned to be taken;
- Name and telephone number of individual reporting the spill;  
and
- Any additional pertinent information.

Facilities with a spill history will have additional reporting requirements as summarized below (per 40 CFR Section 112.4). Two types of facility spills are subject to additional USEPA reporting requirements. A facility is subject to the requirements if it has either:

- A discharge of more than 1,000 gallons of oil into navigable waters in a single spill event, or
- A discharge of oil in harmful quantities, as defined in 40 CFR 110, into navigable waters in two reportable spill events within any consecutive 12-month period.

Should the Waterside Power facility fall under these provisions, the owner or operator of the facility must submit to the USEPA Region 1 Administrator, within 60 days from the time such facility becomes subject to this provision, the following information:

- Name of facility;
- Name(s) of the owner or operator of the facility;
- Location of facility;



- Name and address of the registered agent of the owner or operator, if any;
- Date and year of initial facility operation;
- Maximum storage/handling capacity of the facility and normal daily throughput;
- Description of the facility including maps, flow diagrams, and topographical maps;
- A complete copy of this plan with any amendments;
- The cause(s) of such spill, including a failure analysis of the system or subsystem in which the failure occurred;
- The corrective actions and/or countermeasures taken, including and adequate description of equipment repairs and/or replacements;
- Additional preventive measures taken or contemplated to minimize the possibility of recurrence; and
- Any other related information required by the USEPA Regional Administrator to be submitted.

This information must be submitted to the following address:

The Regional Administrator  
U.S. Environmental Protection Agency, Region 1  
1 Congress Street  
Boston, MA 02114-2023

A complete copy of all of the above information provided to the USEPA Regional Administrator shall also be sent at the same time to the Bureau of Waste Management; Oil & Chemical Spill Response Division, of the Connecticut Department of Environmental Protection at the address presented above. Additionally, a copy of all information provided to USEPA and CTDEP will be retained with this Plan by Waterside Power.

#### 4.3 Post Spill Review

Following a spill event, all parties involved in the detection, reporting, and mitigation of the spill will conduct a review of the facility to evaluate the effectiveness of their response actions. If deficiencies are noted during this review session, procedural changes will be made to this Plan in an effort to better respond to future spill events.

#### 4.4 Evacuation Plan

The following section describes the site evacuation plan to be followed in the event of a release at the facility. The evacuation routes and assembly area are depicted on the Site Plan, Figure 2.

##### 4.4.1 Facility Assembly

The purpose of assembly is to ensure that all on-site personnel are aware of an emergency situation and to account for all personnel at the facility (roll call). Once assembled, facility management will give instructions and/or recommend evacuation.

#### 4.4.2 Facility Evacuation

The Spill/Stormwater Management Team Leader will determine whether facility evacuation is necessary. The decision will be based on careful assessment of persistent conditions and the risk posed to facility personnel. During an evacuation, the Spill/Stormwater Management Team Leader will account for all personnel leaving the facility (roll call). Evacuation of the facility will also include contacting appropriate outside parties (e.g., fire department, police, etc.) to provide needed assistance and/or support a larger area evacuation.

Should building evacuation be necessary, facility personnel will proceed to the nearest exit and assemble in the parking area outside the office trailer. Roll call will be taken by department supervisors. If off-site evacuation is deemed necessary, personnel will leave via the corner of Amelia Place and Betts Avenue.

## 5.0 STORMWATER MANAGEMENT

Section 5.0 presents a description of stormwater drainage at Waterside Power and stormwater management procedures implemented by facility personnel. This section is divided into three subsections which discuss (1) Site Drainage, (2) Measures and Controls and (3) Stormwater Monitoring. These subsections are presented below.

### 5.1 Site Drainage

Stormwater is collected at the site in various locations. Stormwater drains from the property via several catch basins through the storm sewer system existing through an oil/water separator. Typically, stormwater generated on the ground and paved areas flows along the natural contours and gradient of the surface towards catch basins located on the site property. Some of the stormwater in these areas will evaporate or slowly infiltrate. The catch basins direct stormwater to an outfall located along the property's southern boundary. This outfall drains into the wetland located on the south side of the property.

There are six stormwater collection systems installed on the Water Power site. They are:

The main stormwater catch basin system collects stormwater on the middle and lower decks. This collected stormwater then flows through an oil/water separator and discharges to the wetlands located on the south side of the site.

The stormwater catch basin system located on the upper deck consists of 2 catch basins which drain the stormwater from the landscaped area. These systems are connected to the City of Stamford's stormwater collection system. The City's system collects stormwater from the roadways adjacent to the site and flows south through an easement located on the eastern side of the site. Stormwater from this system joins the discharge from the oil/water separator prior to discharging to the wetlands located on the southern side of the site.

The secondary containment tanker truck pad sump is a collection system that is inspected for oil sheen prior to manually pumping its contents to the nearest catch basin that is drained to the oil/water separator.

The two GSU sumps are collection systems that are inspected for oil sheen prior to manually pumping their contents to the nearest catch basin that is drained to the oil/water separator.

Stormwater that collects within the bermed areas of the turbines is inspected for oil sheen prior to funneling to a 70-gallon carboy. The carboy is pumped to one of the nearest catch basins connected to the oil/water separator.

Two infiltrations channels have been constructed and situated on the site as described in Section 5.2.2.

Figure 3 depicts the site drainage systems.

## **5.2 Measures and Controls**

This section describes the Measures and Controls adopted by the facility for stormwater management. The general Measures and Controls are those adopted by the State of Connecticut. Any modifications to these practices will be evaluated carefully in order to ensure compliance with appropriate regulations. See Table 4 for information on specific Measures and Controls.

#### 5.2.1 Good Housekeeping

Good housekeeping is used to maintain a clean and orderly workplace and to reduce the potential for accident spills or releases of materials that could contaminate stormwater. Drums and tanks are clearly tagged and labeled to reduce human error. Tanks and equipment are regularly inspected.

#### 5.2.2 Sediment and Erosion Control

The Waterside Power site is tiered and relatively flat on each of the three decks. The sloped area between the middle and upper decks has been seeded and plantings are used to stabilize the bank to reduce the potential for erosion and induce infiltration of the runoff. Each of the three decks is slightly sloped to the south for natural drainage to the wetland areas located south of the site.

Two riprap infiltration channels have been installed at the site to help reduce the potential for erosion. The channels were constructed by digging a trench 2 feet wide by 1 foot deep and then lined with trap rock. The first infiltration channel is situated on the eastern side of the site and starts at the southeast edge of the transformer and runs south to the wetlands. The second channel is situated on the western side of the site and runs west towards the catch basins located on the western edge of the property.

#### 5.2.3 Preventive Maintenance

Facility equipment, including tanks, associated piping, pavement, power generating turbines, etc. is inspected weekly for any signs of wear and tear. As wear is identified, items are appropriately repaired or replaced.

Waterside Power inspects the catch basins and rainwater sumps located on the property weekly.

#### 5.2.4 Spill Prevention and Response

The Spill Prevention Team is the designated group accountable for spill and Stormwater pollution prevention at the facility. Members of the Team report

to site management. These persons are identified in the Spill Prevention Team List at the beginning of the Plan (page i).

The transfer of products to the ASTs at the Waterside Power is done via tank truck through hoses. Waterside Power has established a policy to oversee all transfers to ASTs. The Spill/Stormwater Management Team members are trained to assist and respond to problems encountered during off-loading operations.

The areas where storage tank are loaded are kept clear of vehicle hazards and overhead clearance is adequate for all tanker truck vehicles. These areas are kept clear of unnecessary equipment and debris. Incidental spillage due to normal off-loading operations is immediately cleaned up upon termination of operation using any combination of absorbent pads and speedi-dri. Vehicles in the off-loading areas are inspected for leakage of fluids and such leaks, if any, are removed / contained immediately. These areas are inspected informally on a daily basis to ensure that the areas are kept clean and orderly.

#### 5.2.5 Non-stormwater Discharges

There are no other water related discharges on this site.

#### 5.2.6 Management of Runoff

For the purposes of this plan, runoff management is defined as practices that divert, infiltrate, reuse, or treat stormwater runoff, and not practices that limit exposure of potential pollutants to direct rainfall or runoff. Presently, runoff management practices used at the facility include the oil/water separator described above.

TABLE 4

Waterside Power, L.L.C.  
Combined SPCC/SWPPP PLAN  
*Measures and Controls*

Potential Pollutant Source	Good Housekeeping	Preventative Maintenance	Spill Prevention
Stormwater System	- Maintain areas near storm drains in reasonably clean	Catch basins and O/W separator are inspected	- Use Spill mat during releases

	condition	weekly and cleaned as needed.	
Tanker Transfer Pad and Transformer Containment	<ul style="list-style-type: none"> <li>- Maintain area in reasonably clean condition</li> <li>- Remove stray debris as needed</li> <li>- Monitor Stormwater and remove ASAP.</li> </ul>	<ul style="list-style-type: none"> <li>- Monitor and inspect sumps on a weekly basis</li> <li>- Monitor all product transfer events</li> </ul>	<ul style="list-style-type: none"> <li>- Assure integrity of tanks and monitoring equipment</li> </ul>
Oil, & Spent Oil Storage Area	<ul style="list-style-type: none"> <li>- Maintain area in reasonably clean condition</li> </ul>	<ul style="list-style-type: none"> <li>- Perform inspections</li> <li>- Monitor filling procedures</li> <li>- Do not overfill</li> </ul>	<ul style="list-style-type: none"> <li>- Keep inside building</li> <li>- Maintain spill control equipment nearby</li> <li>- Place sorbent socks around interior perimeter of Connex Box</li> <li>- Assure integrity of containers and hoses</li> </ul>
Oil AST's & Turbine Units	<ul style="list-style-type: none"> <li>- Maintain area in reasonably clean condition</li> <li>- Remove stray debris as needed</li> <li>- Monitor Stormwater and remove ASAP.</li> </ul>	<ul style="list-style-type: none"> <li>- Monitor and inspect sumps on a weekly basis, or periodically during rainfall events.</li> <li>- Monitor all product transfer events</li> </ul>	<ul style="list-style-type: none"> <li>- Assure integrity of tanks and monitoring equipment</li> <li>- Inspect turbine decks for signs of oil releases</li> </ul>

### 5.3 Stormwater Monitoring Program

The CTDEP Stormwater General Permit specifies required stormwater monitoring, which is described below in four principals sections: (1) General Overview, (2) Schedules and Test Parameters, (3) Sample Collection and Laboratory Testing, and (4) Reporting Requirements.

#### 5.3.1 General Overview

The Waterside Power site consists of one stormwater discharge location. Stormwater run-off discharge associated with the collection of Stormwater from the middle and lower decks. The collected stormwater is passed through an oil/water separator prior to discharge. This will be referred to as Outfall Serial Number 001 (OSN 001). This outfall location is depicted on Figure 3. The Stormwater Monitoring Program outlined in the Connecticut General Permit specifies that the site be required to fulfill stormwater sampling and analytical testing requirements associated with discharge, as such Waterside Power collects an annual stormwater sample from outfall OSN 001.

#### 5.3.2 Schedules and Test Parameters

The CTDEP Stormwater General Permit requires annual testing. The permit also requires stormwater to be analyzed for any other parameters required to be sampled for under other water discharge permits issued to the site. Table 5 summarizes the collection schedule and parameters to be tested for at OSN 001.



TABLE 5  
Waterside Power, L.L.C.  
Combined SPCC/SWPPP PLAN

*Stormwater Sampling Analytes and Numeric Limits*

Effluent Characteristic	Units	Discharge Target Goal Limitations	Sampling Frequency
Total Oil and Grease	mg/L	2.5	Annual
Chemical Oxygen Demand	mg/L	45	Annual
Total Suspended Solids	mg/L	30	Annual
Total Phosphorous	mg/L	0.2	Annual
Total Kjeldahl Nitrogen	mg/L	1.25	Annual
Nitrate as Nitrogen	mg/L	0.75	Annual
Total Copper	mg/L	0.060	Annual
Total Lead	mg/L	0.030	Annual
Total Zinc	mg/L	0.200	Annual
Fecal Coliforms	#/100 mL	NL	Annual
Aquatic Toxicity	LC <sub>50</sub>	LC <sub>50</sub> ≥ 100%	Annual
pH (rainfall)	S.U.	NL	Annual
pH (stormwater sample)	S.U.	NL	Annual

### 5.3.3 Sample Collection

Waterside Power is required to obtain a stormwater sample from OSN 001 on an annual basis. The effluent from outfall OSN 001 is deemed to be representative of the discharges from the site. The sampling is to be conducted during a storm event that is greater than 0.1 inches in magnitude that occurs at least 72 hours after any previous storm event of 0.1 inch or greater. Grab samples are to be used for all monitoring. Grab samples are to be collected within the first 30 minutes of a storm event discharge. Runoff events resulting from snow or ice melt cannot be used to meet the minimum annual monitoring requirements. There should be no distinctly visible floating scum, oil or other matter contained in the stormwater discharge.

For each storm event monitored, the following information is to be collected:

The date, temperature, time of the start of the discharge, time of sampling and magnitude (in inches) of the storm event sampled.

The duration between the storm event and the end of the previous measurable (greater than 0.1 inch rainfall) storm event.

The following outlines the stormwater sample collection and laboratory testing procedures to be followed for each outfall.

1. Use a clean dedicated transfer container to collect samples. Place a clean container under the discharge outfall and rinse three times with stormwater. If a clean container is not available, samples may be collected directly from the outfall. Fill the collection container with stormwater without disturbing the surrounding area. Cover container and move to area where sub-samples can be prepared.
2. Collect pH of samples before transferring the samples into the containers.
3. Prepare all samples by pouring of stormwater from the collection container. (Do not transfer sample between sample jars or transfer sample stormwater back into the collection container.)
4. Label all samples and store them in a cooler with ice or refrigerator at 4° C.
5. Prepare a Chain of Custody and transport samples to CT Certified Laboratory as soon as possible (Fecal Coliform test must be initiated within 6 hours after sampling).
6. Ensure that the laboratory follows testing procedures as described in the Connecticut Stormwater General Permit Regulations.

#### 5.3.4 Recordkeeping and Reporting Requirements

For each stormwater sample taken, Waterside Power will record the following information:

1. The place, date and time of sampling.
2. The person(s) collecting samples.
3. The dates and times the analyses were initiated.
4. The person(s) or laboratory that performed the analyses.
5. The analytical techniques of methods used.
6. The results of all required analyses.

The CTDEP has established Stormwater Monitoring Report (SMR) Forms that are to be filled out and submitted to the CTDEP. Monitoring results are to be submitted to the CTDEP within 90 days of the date of sampling. Signed and dated originals of the SMR Forms will be submitted to the CTDEP at the following address:

Water Toxics Programs Coordinator  
Bureau of Water Management  
Department of Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

A copy of the completed Monitoring Forms will be kept in the facility office.

## 6.0 TRAINING, INSPECTIONS AND RECORDKEEPING

This section of the Plan describes Training, Inspections and Recordkeeping procedures for Waterside Power. Appendix B contains record keeping forms for each of these procedures. The Spill Prevention Team maintains the records of training and inspections.

### 6.1 Training

This section discusses the type and scope of the training offered to Waterside Power employees responsible for specific functions listed under this plan.

#### 6.1.1 Spill Prevention Plan

The Spill Prevention Team is the designated group accountable for oil/hazardous material spills prevention at the Waterside Power Site. The Team is listed on page i of the Plan.

Waterside Power's Training program will provide the Team with techniques to prevent or recognize existing or potential spills, spill containment, and response procedures and the appropriate notification required in the event of a spill. Training typically includes a combination of on-the-job and classroom training. Specific training includes:

1. Instructions on the contents of this Plan.
2. Understanding the risks and hazards associated with the products stored on-site.
3. Training in general maintenance schedules and procedures.
4. Familiarization with facility documentation related to operations.
5. Instruction regarding site spill response actions and spill management procedures, including familiarization with pollution abatement equipment (sorbent materials, etc.) and the use of available containment equipment.
6. Operation of fire-fighting equipment
7. Familiarity with hazardous waste pollution controls laws, rules and regulations.

The Spill Prevention Team is instructed to:

1. Exercise care in the transfer of all products.
2. Never leave a transfer operation unattended.
3. Keep a close watch on storage tank levels and product pipelines while conducting transfer operations.
4. As a general rule, do not wait for problems to occur.
5. Anticipate problems and take precautionary measures to prevent them.

Waterside Power's Spill Prevention Team will conduct informal spill prevention briefings, which focus on known spill events, malfunctioning equipment and recently developed prevention measures. All facility

operations personnel are trained that care and good judgment are the best means of preventing a spill.

#### **6.1.2 Stormwater Pollution Prevention Training**

To meet the training requirements of the CTDEP Stormwater General Permit, training sessions will be held on an annual basis. All personnel associated with the facility operations are required to attend.

Training Topics will include the following items:

1. A review of the proper measures and controls to be used by employees on a regular basis, including; spill prevention and response, as described by the SPCC components of this Plan; standard housekeeping measures; and materials handling procedures.
2. A review of the most recent inspection results and any resulting changes to stormwater pollution prevention or new requirements.
3. A review of sampling methodology.

### **6.2 Inspections**

Facility personnel on duty are responsible for the entire site and its proper operation during their shift. The personnel most likely to identify a spill or release conduct facility inspections. Site walkovers are conducted daily and inspections of various systems are performed weekly.

Waterside Power has developed inspections logs for the SPCC and SWPP components of this Plan. The logs are designed to meet the inspection requirements of spill prevention, control and countermeasures and stormwater management. Copies of the logs are presented in Appendix B. The Spill Prevention Team maintains records of inspections. The sections below describe the components of the site's inspection.

#### **6.2.1 Stormwater Comprehensive Site Compliance Evaluation**

One or more persons on the Spill Prevention Team will conduct comprehensive site compliance evaluations every six months at the Waterside Power site. All potential sources of pollution identified in Table 1

of this Plan will be inspected to assure that appropriate Measures and Controls (Section 5.2) are implemented. Any modification, including the elimination, movement or creation of an exposed area or pollution source, will be documented. The Plan will be updated to reflect this information as needed.

The semi-annual inspections will be conducted, when possible, during a rainfall event in April and October. The Comprehensive Site Compliance Evaluation Form is presented in Appendix B. Any deficiencies observed during the evaluation will be noted on the Form.

Within thirty days of the inspection, follow-up actions will be taken to correct any deficiencies. If the corrections cannot be made within the thirty-day period, a schedule for implementation of the corrections will be added to the Plan within the thirty-day period. The Form and/or follow-up actions will be maintained by the Spill Prevention Team and will be appended to the inspection sheet identifying the deficiency.

#### 6.2.2 Other Inspections

On a daily basis, during the course of normal operations, personnel will conduct a documented walkthrough of the facility to ensure that all equipment, systems and structures are in a satisfactory condition and to uncover any conditions that may adversely impact spill potential or the quality or storm water discharges. At a minimum, the facility components that will be considered in conducting the daily inspection include product storage and handling equipment, emergency response resources, tanks, containments areas, material and waste storage areas, catch basins, fueling areas, piping valves, oil/water separator, generator, transformers, and turbines.

Watersides Power's ASTs are subject to regular visual inspections, as described in the various inspection log forms located in Appendix B. Visual inspections are also conducted when material repairs or other construction on a particular tank is undertaken. Tank cleaning is conducted on an as-

needed basis. Internal appurtenances are inspected each time the tanks are cleaned.

## 6.3 Equipment Testing

### 6.3.1 Aboveground Storage Tank Testing

As required by 40 CFR 112.8(c)(6), the five aboveground storage tanks located on the middle deck will be regularly tested for integrity (minimum of once every ten years). In addition to visual inspections, the tanks must be integrity tested using one of the following methods:

- Hydrostatic testing;
- radiographic testing;
- ultrasonic testing;
- acoustic emissions testing; or
- another method of non-destructive shell testing.

Testing records will be maintained by the facility for a minimum of three years.

### 6.3.2 Aboveground Piping Testing

As required by 40 CFR 112.8(d)(4), integrity testing for aboveground piping will be conducted at the time of installation, modification, construction, relocation, or replacement.

Testing records will be maintained by the facility for a minimum of three years.

## 6.4 Record Keeping and Plan Updates

All training, inspection and test record will be maintained in the facility office for a minimum of three years. An appropriate supervisor will sign record, where applicable. Modifications to this Plan will be recorded in the Combined Plan Amendment Log in Appendix B.

This Plan shall be reviewed frequently and at least annually by the Spill Prevention Team to verify that it complies with current regulations. During this review, checks will be made with USEPA, CTDEP and other appropriate agencies to verify that the most current governing regulations are available for review. The Plan will also be

reviewed, and modified as necessary, in the event of a spill event (within 14 calendar days of knowledge of release), major facility changes, administrative changes or the required triennial review. The Plan is required to be re-certified by a licensed Professional Engineer at least once every three years or if the site has been modified (hence changing the contents of the plan). Changes to facility phone numbers and members of the spill team do not require P.E. certification



## FIGURES

FIGURE 1 SITE LOCATION MAP

FIGURE 2 SITE PLAN

FIGURE 3 SITE DRAINAGE MAP

APPENDIX A

STANDARD OPERATING PROCEDURES

## TANK TRUCK UNLOADING PROCEDURES

---

The following tank truck loading/unloading procedures must be followed at all times:

### General:

1. Inspect unloading area and secondary containment before and after each use.
2. Cover storm drain catch basins in the area surrounding the unloading zone, using containment mat suitable for the catch basin and for the material being delivered. Utilize spill containment structures (drip pans, absorbent blankets, etc.) beneath hose connections and to block spills from reaching the downgradient catch basin.
3. Prior to entering the site, inspect the tank truck for leaks or unusual conditions.
4. Park vehicle within the secondary containment and use the minimum length of hose possible to complete the connection between the vehicle and tank.
5. Park vehicle within the designated unloading area and ensure the parking brakes are set; the transmission is placed in low, reverse, or parking gear; and motor lights radio and all other electrical equipment on the truck is turned off.
6. Chock blocks will be placed in front of the truck's wheels and behind the trailer wheels to safeguard against accidental movement and rupture of transfer lines. Use bonding wires as appropriate.
7. Verify that emergency spill containment equipment is readily available prior to beginning transfer operations. The tank truck should also be equipped with similar emergency spill containment equipment.
8. The driver and attending Waterside Power Project employee shall remain at the storage tank at all times and shall not leave the tank and vehicle unattended during the loading/unloading process.
9. Truck maintenance or servicing will not be performed during unloading. Smoking is not allowed during unloading operations. All unloading station signs and labels will be followed.
10. Postpone deliveries during severe weather conditions, if possible.

### Prior to Transfer:

1. Inspect all storage tank flanges, joints, connections, and outlets for evidence of cracks and other sources of leakage. Verify that emergency shutoff valves are operational. Tighten, adjust, or replace as necessary prior to any loading/unloading operation.
2. Visually check all hoses for leaks and wet spots
3. Verify that sufficient volume is available in the receiving tank to receive the product to be pumped. When unloading a tank truck into an AST, check the level gauge on the AST.
4. Establish adequate bonding/grounding of the tanker truck before connecting to the product transfer point. The electric conductor should be connected to the container to be filled and subsequently connected to the container from which the liquid is to come. The latter connection should be well-removed from the opening from which the material is to be discharged thereby minimizing the potential ignition of vapors due to discharge of static electricity.

5. Keep hose ends tightly capped while moving hoses into position

#### During Transfer:

1. When transferring liquids, shut off motors or auxiliary or portable pumps while making and breaking hose connections.
2. Periodically inspect the condition of bonding/grounding.
3. Lines, hoses, and connections will be observed for leaks during unloading.
4. Monitor the liquid level in the receiving tank during filling operations to prevent overflow.
5. Do not top off tank. Provide a minimum of five (5) percent free space within the tank to prevent leakage due to thermal expansion. Closed valves connections of an overfill condition occurs and withdraw sufficient liquid from the tank to permit complete drainage of the vent pipe and hose fill.

#### After Transfer:

1. Close all tank and loading valves before disconnecting.
2. Securely close all vehicle internal, external, and dome cover valves before disconnecting.
3. Make sure that all material transfer operations are complete before disconnecting any transfer lines.
4. Make sure that the hoses or other connecting devices are drained, vented, or blown down to remove the remaining material before moving them away from their connections.
5. Use a drip pan when breaking a connection outside of containment areas.
6. Cap the end of the hose or other connecting devices before moving them to prevent the leakage of residual product.
7. Cap associated hose risers.
8. Close all hose riser valves not in use.
9. Secure all hatches.
10. After hatches have been secured, disconnect bonding/grounding wires.
11. Remove any wheel chocks that have been used.
12. Prior to vehicle departure, make sure that all connections, fill lines, and bonding/grounding wires are disconnected.
13. After the transfer lines are disconnected and prior to vehicle departure, inspect the outlets for evidence of leakage.
14. Remove any temporary spill equipment deployed during transfer operations.

APPENDIX B

RECORDKEEPING LOGS

## STORM WATER DRAINAGE RECORD

## GSU AREA SECONDARY CONTAINMENT

[illegible]

\* The water must not show a sheen of oil before it is discharged and the discharge of water must be monitored from start to finish.

## STORM WATER DRAINAGE RECORD

## TANKER OFF-LOADING AREA SECONDARY CONTAINMENT

[illegible]

\* The water must not show a sheen of oil before it is discharged and the discharge of water must be monitored from start to finish.

## STORM WATER DRAINAGE RECORD

## TURBINE AREA SECONDARY CONTAINMENT

[illegible]

\* The water must not show a sheen of oil before it is discharged and the discharge of water must be monitored from start to finish.



Waterside Power, L.L.C.

Stamford, CT

*Summary of Historical Spills*

Date	Product/ Quantity	Source	Detection Method	Comments <sup>(1)</sup>

Notes:

1. Comments section will include quantity of product to navigable water, method of recovery, contractor (if applicable), clean-up actions, notifications (if applicable), enforcement (if applicable), steps to reduce reoccurrence and effectiveness of monitoring equipment (if applicable).

## COMBINED PLAN AMENDMENT LOG

All Combined Plan amendments must be certified by a Professional Engineer. All amendment copies will be maintained with this plan, and a summary of each amendment will be noted on this log sheet.

[illegible]

## PERSONNEL TRAINING RECORD

Waterside Power employees who are involved in oil-handling activities must receive regular, informal training in the proper operation and maintenance of equipment to prevent discharges of oil, system controls, and applicable oil pollution control laws, rules, and regulations.

### Initial Training

This should include a full working knowledge of the system. Specific items that should be addressed are listed below.

General facility activities ☐

Operation of facility storage mechanisms ☐

Operation of facility transfer mechanisms ☐

Read and become familiar with this SPCC Plan. Particular emphasis should be put on the items listed below.

Emergency response equipment operation and maintenance ☐

Emergency response procedures ☐

PERSONNEL SIGNATURE: \_\_\_\_\_

SUPERVISOR SIGNATURE: \_\_\_\_\_

DATE: \_\_\_\_\_

Waterside Power, L.L.C.  
Stamford, CT

COMPREHENSIVE SITE COMPLIANCE EVALUATION FORM

Note: Refer to Table 4 in Section 5.0 of the Plan for additional description of Measures and Controls. Additional inspection comments should be put on the back of this Form.

Inspector: _____		Inspector's Signature: _____						
Storm Event? (Yes/No): _____		Date: _____ Time: _____						
Permittee: _____		Permittee Signature: _____						
Potential Pollutant Source	Good Housekeeping		Preventative Maintenance		Sediment and Erosion Control		Problems Identified	Corrective Action Taken and Date
	Accept.	Unaccept.	Accept.	Unaccept.	Accept.	Unaccept.		
Aboveground Storage Tanks								
Tanker Transfer Pad								
Containment								
Fuel Off-Loading Operation								
Transformers:								
GSU and Containment								
Pad Transformer								
Storage:								
Product Storage								
Spent Oil Storage								
Turbine Area:								
Turbine 1								
Turbine 2								
Turbine 3								
Aboveground Pipelines								
Spill Response Equipment adequately stocked (Yes/No)		Spill Kits/Granular (Yes/No):		Absorbent				
Was any distinct discharge points identified? (Yes/No)		Fire Extinguishers (Yes/No):						

## APPENDIX C

### SPIII NOTIFICATION FORM

# INTERNAL SPILL NOTIFICATION REPORT

1.	DATE:	
2.	PERSON REPORTING	
	<ul style="list-style-type: none"> <li>NAME: _____</li> <li>ORGANIZATION: Waterside Power, LLC PHONE NO.: _____</li> </ul>	
3.	LOCATION/ADDRESS OF SPILL:	
4.	DID OIL ENTER A CATCH BASIN? Y <input type="checkbox"/> N <input type="checkbox"/> DID OIL DISCHARGE FROM OIL/WATER SEPARATOR? Y <input type="checkbox"/> N <input type="checkbox"/>	
5.	ON-SITE SUPERVISOR:	
6.	MATERIAL SPILLED/RELEASED:	
	_____ No. 2 FUEL OIL	QUANTITY: _____
	_____ LUBE OIL	QUANTITY: _____
	_____ INSULATING OIL	QUANTITY: _____
	_____ OTHER (Specify _____)	
7.	SOURCE OF SPILL TIME OF SPILL: AM/PM	IS SOURCE SECURED? YES/NO
8.	HOW DID SPILL OCCUR?	
9.	CLEAN-UP/CORRECTIVE ACTION TAKEN:	
10.	TIME SPILL WAS REPORTED TO (IF APPLICABLE):	
	<ul style="list-style-type: none"> <li>WATERSIDE POWER EMERGENCY RESPONSE COORDINATOR CONTACT: _____ TIME: _____</li> <li>NATIONAL RESPONSE CENTER (800) 424-8802 CONTACT: _____ TIME: _____</li> <li>CTDEP OIL &amp; CHEMICAL EMERGENCY RESPONSE (860) 424-3338 CONTACT: _____ TIME: _____</li> <li>STAMFORD EMERGENCY MANAGEMENT DIVISION 911 CONTACT: _____ TIME: _____</li> </ul>	
Notes:		

## APPENDIX D

### DEP STORMWATER REGISTRATION

APPENDIX E

SUBSTANTIAL HARM DETERMINATION  
FORM



CERTIFICATION OF THE APPLICABILITY OF THE  
SUBSTANTIAL HARM DETERMINATION FORM

Facility Name: Waterside Power Project

Facility Address: 17 Amelia Place, Stamford, Connecticut

1. Does the facility transfer oil over water to or from vessels and does the facility have a total oil storage capacity greater than or equal to 42,000 gallons?

Yes \_\_\_\_\_ No X

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground oil storage tank area?

Yes \_\_\_\_\_ No X

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III of 40 CFR Part 112 Appendix C or a comparable formula<sup>1</sup>) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments?

Yes \_\_\_\_\_ No X

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III of 40 CFR Part 112 Appendix C or a comparable formula<sup>1</sup>) such that a discharge from the facility would shut down a public drinking water intake<sup>2</sup>?

Yes \_\_\_\_\_ No X

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

Yes \_\_\_\_\_ No X

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature \_\_\_\_\_

Title \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_

<sup>1</sup> If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

<sup>2</sup> For the purposes of 40 CFR Part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR Section 143.2(c).

# APPENDIX F

## CERTIFICATIONS

COMBINED SPILL PREVENTION, CONTROL AND  
COUNTERMEASURE (SPCC)/STORMWATER POLLUTION  
PREVENTION (SWPP) PLAN

WATERSIDE POWER L.L.C.  
STAMFORD, CONNECTICUT

REQUIRED MANAGEMENT APPROVAL

This Combined Spill Prevention, Control and Countermeasure (SPCC)/Stormwater Pollution Prevention (SWPP) Plan as been reviewed by appropriate Officer or Managers and will be implemented as described herein.

"I certify, under penalty of law, that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

\_\_\_\_\_  
Signature

Ken Roberts  
Name

Development Manager, Waterside Power, LLC  
Title

\_\_\_\_\_  
Date

COMBINED SPILL PREVENTION, CONTROL AND  
COUNTERMEASURE (SPCC)/STORMWATER POLLUTION  
PREVENTION (SWPP) PLAN

WATERSIDE POWER L.L.C.  
STAMFORD, CONNECTICUT

PROFESSIONAL ENGINEER CERTIFICATIONS

"I certify that I have thoroughly and completely reviewed the Spill Prevention, Control and Countermeasure portion of the Stormwater Pollution Prevention portion of the Combined Spill Prevention, Control and Countermeasure/Stormwater Pollution Prevention Plan prepared for this site. I further certify based on such review and on my professional judgment, that the Combined Plan meets the criteria set forth in the Oil Pollution Prevention regulations found in 40 CFR Part 112 and the criteria set forth in the Connecticut General Permit for the Discharge of Stormwater Associated with Industrial Activity, issued on October 1, 1997. I am aware that there are significant penalties for false statements in this certification, including the possibility of fine and imprisonment for knowingly making false statements."

John D. Plante, P.E.  
Registered Professional Engineer

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

Registration No. 19399

State: Connecticut

STORMWATER POLLUTION PREVENTION (SWPP) PLAN

WATERSIDE POWER L.L.C.  
STAMFORD, CONNECTICUT

NON-STORMWATER DISCHARGE EVALUATION

"I certify that in my professional judgment, the discharges from the site consist only of stormwater or of stormwater combined only with groundwater. This certification is based on testing and evaluation of the stormwater discharge from the site. I further certify that all potential sources of non-stormwater at the site, a description of the results of any test and/or evaluation for the presence of non-stormwater discharges, the evaluation criteria or testing method used, the date of any testing and/or evaluation and the on-site drainage points that were directly observed during the test have been described in detail in the Combined Spill Prevention, Control and Countermeasure/Stormwater Pollution Prevention Plan prepared for the site. I further certify that no interior building floor drains exist which are connected to any storm drainage system or which may otherwise direct interior floor drainage to exterior surfaces, unless such floor drain connection has been approved and permitted by the commissioner. I am aware that there may be significant penalties for false statements in this certification, including the possibility of fine and imprisonment for knowingly making false statements."

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

John D. Plante P.E.,  
Name

Registered Professional Engineer  
Title

Visual Inspection Log  
Waterside Power L.L.C.  
Stamford, CT

	No. 2 Fuel Oil AST (T1)	No. 2 Fuel Oil AST (T2)	No. 2 Fuel Oil AST (T3)	No. 2 Fuel Oil AST (T4)	No. 2 Fuel Oil AST (T5)	Fuel Forwarding Area	Active Transformer	Stand-by Transformer	Pad T ransformer	Unit 1	Unit 2	Unit 3
<b>TANK LEVELS</b>						N/A	N/A	N/A	N/A	N/A	N/A	N/A
Exterior surfaces and welds show signs of leakage or corrosion?												
Tank foundation has eroded or settled?												
Tank supports are deteriorated or buckled?												
Leak detection systems show detection?												
Valves and pressure release devices are obstructed?												
Evidence of oil on ground in unloading area?												
Piping shows sign of corrosion?												
Evidence of leaking underneath piping?												
Liquids have accumulated in containment?												
Evidence of oil leaking into containment or onto ground?												
Containment foundation has settled, plastic is torn, berm has eroded?												
Spill kits (equipment) are stocked?												

#### Fuel Forwarding Area

All valves closed when not in service \_\_\_\_\_  
Check for Leaks \_\_\_\_\_

#### De-min Water System

Heat trace is on \_\_\_\_\_  
Water Supply shed ok \_\_\_\_\_  
Check for leaks \_\_\_\_\_  
De-min water trailer propane level \_\_\_\_\_  
Storage Tank level normal \_\_\_\_\_

#### Active Transformer

Water pumped out of basins	_____
Check for leaks	_____
<b>Stand-by Transformer</b>	
Water pumped out of basins	_____
Check for leaks	_____
<b>Turbine Unit 1</b>	
Boiler fuel tank ok	_____
Boiler forwarding pumps	_____
Fuel heat exchanger	_____
Aux skid area	_____
Unit control room	_____
General walk down of complete unit	_____
<b>Turbine Unit 2</b>	
Boiler fuel tank ok	_____
Boiler forwarding pumps	_____
Fuel heat exchanger	_____
Aux skid area	_____
Unit control room	_____
General walk down of complete unit	_____
<b>Turbine Unit 3</b>	
Boiler fuel tank ok	_____
Boiler forwarding pumps	_____
Fuel heat exchanger	_____
Aux skid area	_____
Unit control room	_____
General walk down of complete unit	_____